

Remarks

This Amendment is being filed concurrently with a Request for Continued Examination ("RCE"). Reconsideration and allowance of this application, as amended, are respectfully requested.

Claims 1, 9, 14, and 20 have been amended. Claims 3 and 22 have been canceled without prejudice or disclaimer. New claims 23 and 24 have been added. Claims 1, 2, 5-17, 20, 21, 23, and 24 are now pending in the application, with claims 2 and 15 previously withdrawn from consideration as being directed to a non-elected invention. Claims 1, 20, and 23 are independent. The rejections are respectfully submitted to be obviated in view of the amendments and remarks presented herein. No new matter has been introduced through the foregoing amendments.

Claim 1 has been amended to incorporate features of the invention previously presented in now-canceled claim 3. Instant claim 1 defines an embodiment of the invention that includes "a third glue reservoir configured as two glue subreservoirs disposed downstream of the first glue reservoir and upstream of the second glue reservoir and configured to supply the glue to the second glue reservoir in a pressurized state, *the glue in the third glue reservoir being under a higher pressure than the glue in the second glue reservoir.*" See the depiction of the aforementioned embodiment of the invention in, for example, Applicants' Figure 7. Claims 9 and 14 have been amended to be consistent with instant

claim 1. Independent claim 20 has been amended in a manner similar to that of claim 1.

New claims 23 and 24 have been added to further define the scope of protection sought for Applicants' invention.

Entry of each of the amendments is respectfully requested.

35 U.S.C. § 103(a) – Nasli-Bakir, Kubota, and Boeck

Claims 1, 3, 5-9, and 20-22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2002/0015786 of Nasli-Bakir et al. (hereinafter "Nasli-Bakir") in view of U.S. Patent No. 5,350,600 to Kubota and U.S. Patent No. 5,111,855 to Boeck.

In summarizing the Nasli-Bakir reference, the Office Action relies upon the disclosure in Nasli-Bakir's Figure 1, which depicts *the prior art*. The Office Action asserts that "the apparatus is comprised of a third glue reservoir configure[d] as two glue subreservoirs in the form of day tanks 16 and 18 which as shown in Figure 1 are disposed downstream of the first glue reservoirs (4, 6) and upstream from the glue reservoir 44." The Office Action also asserts that "[f]urthermore *since the glue is pumped* from the third glue reservoir (16, 18) to the second glue reservoir 44 by pumps 30 and 32 the reservoir is configured to supply the glue to the second glue reservoir in a pressurized state

(Figure 1 and Page 2 Paragraphs 0028-0030)" (Office Action pages 3-4) (emphasis added).

The rejection of claims 1, 3, 5-9, and 20-22 under § 103(a) based on Nasli-Bakir, Kubota, and Boeck is respectfully deemed to be obviated. For at least the following reasons, the combined disclosures of Nasli-Bakir, Kubota, and Boeck would not have rendered obvious Applicants' presently claimed invention.

As indicated above in the introductory remarks, instant claim 1 defines an embodiment of the invention that includes "a third glue reservoir configured as two glue subreservoirs disposed downstream of the first glue reservoir and upstream of the second glue reservoir and configured to supply the glue to the second glue reservoir in a pressurized state, *the glue in the third glue reservoir being under a higher pressure than the glue in the second glue reservoir.*"

The combined disclosures of Nasli-Bakir, Kubota, and Boeck do not teach all of Applicants' claim features. The Office Action relies upon the prior art depicted in Nasli-Bakir's Figure 1. The Office Action equates the glue day tank 16 of Nasli-Bakir's Figure 1 to Applicants' claimed third glue reservoir feature. But, as the Office Action acknowledges, Nasli-Bakir's Figure 1 shows that "*the glue is pumped from the third glue reservoir (16, 18) to the second glue reservoir 44 by pumps 30 and 32.*"

That is not Applicants' claimed invention. See Applicants' Figure 7. Instant claim 1 requires that the glue in

the third glue reservoir 103a, 103b be under a *higher pressure* than the glue in the second glue reservoir 102a, 102b, 102c, 102d. The aforementioned feature of Applicants' apparatus is completely different from the prior art disclosed in Nasli-Bakir, in which the glue leaving glue day tank 16 *must be pumped* by metering pump 30 in order for the system, which includes flow meter 34, valve 40, and mixer 38 upstream of spreader pipe 44, to operate. That is, according to the prior art disclosed in Nasli-Bakir, the glue in "the third glue reservoir" (i.e., glue day tank 16) is under a *lower pressure* than the glue in "the second glue reservoir" (i.e., spreader pipe 44).

Furthermore, although not addressed by the Office Action, the machine depicted in Nasli-Bakir's Figure 2 is as lacking as is the prior art shown in Nasli-Bakir's Figure 1. The gluing machine shown in Nasli-Bakir's Figure 2 also requires a metering pump 32 to pump the glue from glue day tank 17 to mixer 38 and spreader pipe 44. And, in introducing "the inventive features of the novel system" (paragraph [0036]), Nasli-Bakir even teaches that, by definition, the glue day tank 17 is open to the atmosphere. That is, as described in paragraphs [0037] and [0038], glue day tank 17 serves as a "waste collection bucket" for the gluing operation:

As indicated above, the day tank 17 for the glue is different from the prior art. Namely, in the first place it is located beneath the spreader pipe 44 where it replaces the waste collection bucket 50 of the prior art system. Furthermore it comprises a stirrer 52.

In operation the day tank, which suitably contains about 15 liters of glue component, as a nominal filling level, will collect any waste glue mixture that is

produced during the gluing operation (15 liters will be consumed in about 10 minutes of operation in average).

Clearly then, for the glue accumulated in Nasli-Bakir's day tank 17 to reach mixer 38 and spreader pipe 44, *it must be pumped, i.e., "[t]he metering pumps 30, 32 are started and the components are fed to the mixer"* (paragraph [0040], describing operation of the machine). That, however, is not Applicants' claimed invention.

Finally, regardless of what Kubota and Boeck may disclose, neither reference rectifies any of the above-described deficiencies of Nasli-Bakir.

Accordingly, the combined disclosures of Nasli-Bakir, Kubota, and Boeck would not have rendered obvious the embodiment of the invention defined by instant claim 1. Now pending claims 5-9 are allowable because they depend from claim 1, and for the subject matter recited therein. Independent claim 20 has been amended in a manner similar to claim 1, and therefore is also allowable. Claim 21 is allowable because it depends from claim 20, and for the subject matter recited therein.

35 U.S.C. § 103(a)

Since the Nasli-Bakir, Kubota, and Boeck combination is applied in each of the other rejections under § 103(a) -- claims 10, 11, 14, and 16 as being unpatentable over Nasli-Bakir in view of Kubota and Boeck, and further in view of U.S. Patent No.

4,420,510 to Kunkel et al. ("Kunkel"); claims 12 and 13 as being unpatentable over Nasli-Bakir in view of Kubota and Boeck, and further in view of Kunkel and in further view of U.S. Patent No. 4,687,137 to Boger et al. ("Boger"); and claim 17 as being unpatentable over Nasli-Bakir in view of Kubota and Boeck, and further in view of U.S. Patent No. 3,965,860 to Cone et al. ("Cone") -- each of these rejections is also respectfully deemed to be obviated. The combined disclosures of the cited references would not have rendered obvious Applicants' presently claimed invention because the disclosures of Kunkel, Boger, and Cone do not rectify any of the above-described deficiencies of the Nasli-Bakir/Kubota/Boeck combination.

Furthermore, there is simply no teaching in any of the references that would have led one to select the references and combine them in a way that would produce the invention defined by any of Applicants' pending claims.

Therefore, the various combinations of references would not have rendered obvious the embodiments of the invention defined by Applicants' pending claims 10-14, 16, and 17.

New claims 23 and 24 have been added to further define the scope of protection sought for Applicants' invention. New claims 23 and 24 are also allowable. Claim 23 requires (i) that the glue in the third glue reservoir 103a, 103b be under a *higher pressure* than the glue in the second glue reservoir 102a, 102b, 102c, 102d and (ii) that a *pressure regulator* 105 be located in

each glue line 110 between the third glue reservoir and the second glue reservoir. See the disclosure at specification page 7, lines 27-28, i.e., that "[t]he pressure regulator 105 forwards glue from the third glue reservoir to the second" and that "[i]t can *reduce the pressure* to the pressure prevailing in the second glue reservoir 102" (emphasis added). As is evident from the aforementioned disclosure, the pressure regulator 105 *reduces* the pressure of the glue as it travels from the third glue reservoir to the second glue reservoir. This feature of Applicants' apparatus is completely different from the machines disclosed in Nasli-Bakir, in which the glue leaving the glue day tank must be *pumped* by the metering pump in order for the system, which includes flow meter 34, valve 40, and mixer 38 upstream of spreader pipe 44, to operate.

Accordingly, for at least all of the reasons presented above in response to the rejections under § 103(a), the cited references neither anticipate nor would have rendered obvious the apparatus defined by claims 23 and 24.

In view of the foregoing, this application is now in condition for allowance. If the examiner believes that an

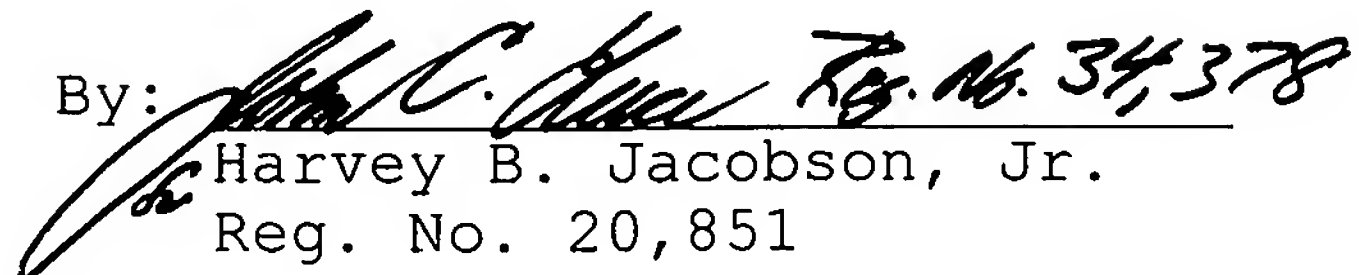
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interview might expedite prosecution, the examiner is invited to
contact the undersigned.

Respectfully submitted,

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